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and AFD China Intellectual Property LLC

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**AFD CHINA INTELLECTUAL  
PROPERTY LAW (USA) OFFICE, INC.,**  
an Oregon corporation,

Plaintiff,

-vs-

**AFD CHINA INTELLECTUAL  
PROPERTY LAW OFFICE,** a Chinese  
Corporation,

Defendant,

**AFD CHINA INTELLECTUAL  
PROPERTY LLC,** a Maryland limited  
liability company,

Counterclaim Plaintiff,

-vs-

**LEI WANG, a/k/a LYNN WANG,**

Third Party Counterclaim Defendant.

Case No.: 3:09-CV-1509-BR

**AFD CHINA'S AND AFD LLC'S  
OMNIBUS MOTION *IN LIMINE***

Pursuant to the Federal Rules of Evidence, AFD China and AFD LLC respectfully move the Court for an Order excluding from trial any irrelevant, prejudicial, or untimely evidence, testimony, and arguments. In particular, AFD China and AFD LLC respectfully request that the Court exclude the following:

1. Any evidence and arguments not related to trademark infringement;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
2. Any arguments or evidence related to any alleged duties AFD China owed to AFD USA or Ms. Wang;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
3. Any evidence and arguments inconsistent with the Court's Summary Judgment order;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
4. Any evidence and arguments related to AFD China's compliance with Chinese tax law or the structure of the parties' cooperation;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
5. Any evidence, analyses, or arguments related to AFD USA's allegation that AFD China has not produced invoices;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
6. Any arguments or allegations regarding the sufficiency of AFD China's document production;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
7. Any references to Serena Morones as a "damages expert" and any opinions from Ms. Morones related to AFD USA's damages;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
8. Any analysis by Ms. Morones regarding AFD China's total revenue;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED

9. Any analysis of AFD China's cases allegedly "originated" by Ms. Wang;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
10. Any testimony or analysis from Ms. Morones regarding John Hansen's rebuttal analysis;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
11. Any damage reports or analysis provided by Darrell Dorrell;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
12. Any testimony from Ms. Wang regarding the reason why her alleged former clients stayed with AFD China;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
13. Any evidence and arguments related to AFD USA's untimely statute of limitations defense;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
14. Any evidence and arguments related to the alleged "incontestability" of AFD USA's registration of the AFD Mark.  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
15. Any evidence or arguments related to AFD USA's Tacking defense;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
16. Any evidence or testimony relating to AFD USA's newsletters;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
17. Any evidence or testimony relating to translations performed by AFD China or AFD USA;  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
18. Any evidence or arguments related to the quality of AFD China's services; and  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED
19. Any reference to AFD China as "AN XIN FON DA."  
\_\_\_\_\_ GRANTED \_\_\_\_\_ DENIED

The grounds supporting this motion are set forth more fully in the accompanying legal memorandum.

Dated: March 7, 2014

/s/ Aimee M. Furness

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ATTORNEYS FOR AFD CHINA  
INTELLECTUAL PROPERTY LAW OFFICE

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of AFD China's and AFD LLC's Omnibus Motion in Limine has been served on all counsel of record, as indicated below, on this 7th day of March, 2014.

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**Via Email**

/s/ Aimee M. Furness

Aimee M. Furness